

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

IN RE:	§	CHAPTER 11
	§	
TODD MEAGHER	§	CASE NO. 20-40208-11
	§	
DEBTOR.	§	

**DEBTOR'S UNOPPOSED MOTION
FOR EXTENSION OF TIME TO FILE SCHEDULES AND STATEMENTS**

TO THE HONORABLE MARK X. MULLIN,
UNITED STATES BANKRUPTCY JUDGE:

NOW COMES TODD MEAGHER, the debtor and debtor-in-possession (the "Debtor") in the above-captioned Chapter 11 reorganization (the "Bankruptcy Case"), and respectfully files this Unopposed Motion for Extension of Time to File Schedules and Statements of Financial Affairs (the "Motion"), and, in support hereof, states as follows:

I. INTRODUCTION

1. This Court has jurisdiction to consider this matter pursuant to 28 U.S.C. § 1334. Consideration of this action is a core proceeding pursuant to 28 U.S.C. § 157(b)(2). Venue is proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409.

2. On January 15, 2020 (the "Petition Date"), the Debtor commenced this Bankruptcy Case by filing a voluntary petition for relief under chapter 11 of title 11 of the United States Code, 11 U.S.C. § 101, et seq. (the "Bankruptcy Code").

3. The Debtor continues to operate his business pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. No trustee, examiner, or official committees have been appointed in this Bankruptcy Case.

II. RELIEF REQUESTED

4. By this Motion, the Debtor respectfully requests the entry of an order providing an extension of fourteen (14) days from the current deadline, January 29, 2020, in which to complete and file all schedules, his statements of financial affairs, summary of assets and liabilities, and income records (collectively, the “Schedules and Statements”).

5. The substantive reasons for Debtor requesting this Motion are as follows:

- a. Debtor was ill for one (1) week after filing for bankruptcy on January 15, 2020;
- b. Debtor’s spouse underwent short-notice surgery on January 27, 2020;
- c. Debtor is still attempting to compile and produce all documents necessary to draft fulsome, accurate Schedules and Statements for submission to this Court.

PRAYER

WHEREFORE, PREMISES CONSIDERED, the Debtor respectfully requests entry of an order extending the Debtor’s time to file his Schedules and Statements for fourteen (14) days—the new deadline being February 12, 2020—without prejudice to requests for further extensions upon cause shown, and for such other and further relief as is just and proper.

Dated: January 28, 2020

Respectfully submitted,

/s/Robert C. Rowe

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PROPOSED COUNSEL
FOR DEBTOR-IN-POSSESSION

CERTIFICATE OF CONFERENCE

The undersigned certifies that, on January 28, 2020, a conference on the merits of this Motion was had with Elizabeth A. Young, trial attorney for the U.S. Trustee, Region 6, who confirmed that the U.S. Trustee is unopposed to the relief sought herein.

/s/Robert C. Rowe

Robert C. Rowe

CERTIFICATE OF SERVICE

The undersigned certifies that, on January 28, 2020, a true and correct copy of the foregoing document was served via ECF notification upon all creditors in this case.

/s/Robert C. Rowe

Robert C. Rowe